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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA**

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 1:12-cv-00841-SEB-MJD

TOBY REEVES, HAOJIE WANG, DANIEL  
WATT, CAMERON GAFF, GIANCARLO  
DI MIZIO JR., SEAN MANGYIK,  
KRISTINE EIKENBERG, RAMAKANT  
MAMIDIDODDI, LEONARDO ALDANA,  
WILLIAM MEEKS SR. and JOHN DOES 2,  
3, 4, 5, 6, 10, 12, 13, 21, 22 and 23,

Defendants.

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**MOTION FOR ENTRY OF CLERK'S DEFAULT**  
**PURSUANT TO FED.R.CIV.P 55(a)**

Pursuant to Fed.R.Civ.P. 55(a), Plaintiff moves for the entry of a default against Defendant, William Meeks, Sr., for failing to plead or otherwise defend this action as required by law. Attached hereto as Exhibit A is the Declaration in Support of Request for Entry of Default. Attached hereto as Exhibit B is the proposed Entry of Default.

Dated: June 27, 2013

Respectfully submitted,

By: /s/ Paul J. Nicoletti  
Paul J. Nicoletti  
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Phone: 248-203-7800  
*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2013, I electronically filed the foregoing document with the Clerk of the Court and all parties using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I further certify that some of the participants in the case are not CM/ECF users. I have mailed the foregoing document via U.S. Mail to the persons set forth in the Service List below.

By: /s/ Paul J. Nicoletti  
Paul J. Nicoletti

**Service List**

William Meeks Sr.  
924 Winchester Street  
Decatur, IN 46733